

1 \$3,700.DEC

2 LEONARDO M. RAPADAS
United States Attorney
3 KARON V. JOHNSON
Assistant U.S. Attorney
4 Sirena Plaza, Suite 500
108 Hernan Cortez Avenue
5 Hagåtña, Guam 96910
TEL: (671) 472-7332
6 FAX: (671) 472-7334

FILED
DISTRICT COURT OF GUAM
FEB -7 2006
MARY L.M. MORAN
CLERK OF COURT

7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE TERRITORY OF GUAM**

10 UNITED STATES OF AMERICA,) CIVIL CASE NO. 05-00040
11)
12 Plaintiff,)
13)
14 vs.) **DECLARATION OF**
15) **KARON V. JOHNSON**
16 \$3,700.00 UNITED STATES)
17 CURRENCY,)
18)
19 Defendant.)
20)
21)
22)
23)
24)
25)
26)
27)
28)

29 **DECLARATION OF KARON V. JOHNSON**

30 I, KARON V. JOHNSON, declare that:

- 31 1. I am the Assistant U.S. Attorney who represents plaintiff in this action.
- 32 2. Defendant, \$3,700.00 in United States Currency was seized from the person of Pi-Ju
- 33 WU, upon her arrest for alien smuggling on August 8, 2005.
- 34 3. The defendant, \$3,700.00 in United States Currency constitutes proceeds traceable to a
- 35 violation of Title 8, United States Code, § 1324(a)(2)(B)(ii) and is, therefore, subject to forfeiture
- 36 to the United States pursuant to Title 8, United States Code, § 1324(b).
- 37 3. According to available records and my best information and belief, the defendant, nor
- 38 the person Pi-Ju WU, is not an infant or incompetent person and is not in the military service of

1 the United States within the meaning of the Soldier's and Sailor's Civil Relief Act of 1940, as
2 amended, or otherwise entitled to the benefits of said Act.

3 4. A copy of the Verified Complaint, Warrant of Arrest and Notice of Arrest was served
4 by hand-delivery service, on December 28, 2005, to the attorney of record for Pi-Ju WU, John F.
5 Gorman. See attachment "A", Certificate of Service.

6 5. Pi-Ju Wu, through her attorney of record, John T. Gorman, has failed to appear or file
7 an answer within the time required by law.

8 6. The default of defendant herein and judgment against the sum of \$3,700.00 United
9 States Currency as prayed for in the complaint should be entered.

10 I declare under penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge.

12 Executed: 2/7/06, at Hagåtña, Guam.

13
14 
15 KARON V. JOHNSON
16 Assistant U.S. Attorney
17
18
19
20
21
22
23
24
25
26
27
28

1 \$3,700.COS

2 LEONARDO M. RAPADAS

United States Attorney

3 KARON V. JOHNSON

Assistant U.S. Attorney

4 Suite 500, Sirena Plaza

108 Hernan Cortes

5 Hagåtña, Guam 96910

PHONE: (671) 472-7332

6 FAX: (671) 472-7334

7 Attorneys for the United States of America

FILED
DISTRICT COURT OF GUAM

DEC 28 2005

RECEIVED

DEC 28 2005

MARY L.M. MORAN
CLERK OF COURT

**FEDERAL PUBLIC DEFENDER
DISTRICT OF GUAM**

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF GUAM**

12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

14 vs.)

15 \$3,700.00 UNITED STATES
16 CURRENCY,)

17 Defendant.)

CIVIL CASE NO. 05-00040

CERTIFICATE OF SERVICE

19 I, KARON V. JOHNSON, Assistant U.S. Attorney for the Districts of Guam and the
20 NMI, hereby certify that on the 28th day of December, 2005, I caused to be served by hand-
21 delivery, a copy of the following documents in the above-referenced case: **Verified Complaint**
22 **of Forfeiture, Warrant of Arrest in Rem, and Notice of Arrest**, to the attorney of record
23 for Pi-Ju WU as follows: John T. Gorman, Federal Public Defender, First Hawaiian Bank Bldg.,
24 400 Rt. 8, Suite 501, Mongmong, Guam 96910.

26 DATED: 12/27/05

27 Karon V. Johnson
Assistant U.S. Attorney

